UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

March 2, 2011

Ms. Denise Decker
St. Elizabeths NEPA Lead
c/o Shirley Walker
General Services Administration – PBS
301 7th Street, SW, Room 6628
Washington, DC 20407

Re: Department of Homeland Security Headquarters Consolidation at St. Elizabeths Master Plan Amendment – East Campus North Parcel, St. Elizabeths Campus in Southeast Washington, DC (CEQ 20100470)

Dear Ms. Decker:

In accordance with the National Environmental Policy Act (NEPA) of 1969, Section 309 of the Clean Air Act and the Council on Environmental Quality regulations implementing NEPA (40 CFR 1500-1509), the U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the Department of Homeland Security Headquarters Consolidation at St. Elizabeths Master Plan Amendment – East Campus North Parcel, St. Elizabeths Campus in Southeast Washington, DC.

The purpose for the Proposed Action is to complete the consolidation of the Department of Homeland Security (DHS) Headquarters offices at St. Elizabeths for a total of 4.5 million gross square feet of secure office and shared-use space plus associated parking by preparing an amendment to the existing 2008 Master Plan that would accommodate a portion of DHS' requirements of up to 750,000 gross square feet of office space, plus parking, on the North Parcel of the East Campus. The Proposed Action is needed to meet the Department's mission requirements for its consolidated Headquarters in furtherance of developing a more cost-effective, efficient, and functional real estate portfolio in the National Capital Region.

The Master Plan Amendment DEIS addresses two primary elements that compose the Proposed Action: 1) St. Elizabeths East Campus North Parcel site development and 2) Transportation Improvements required for DHS consolidation. For the first element, three site development options for the North Parcel are analyzed in the DEIS; they are: Alternative A (East West Bars); Alternative B (Campus Reflection), the Preferred Alternative; and Alternative C (Atrium).

The second element is reevaluation of transportation improvements required for the DHS consolidation that were considered in the 2008 Final Master Plan EIS. Alternatives for the I-295/Malcolm X Avenue interchange and proposed West Campus Access Road, Firth Sterling Avenue/West Campus Access Road intersection, improvements to Martin Luther King, Jr., (MLK) Avenue, and needed transportation improvements to support the East Campus development are considered. Two sets of transportation alternatives incorporating the improvements are analyzed in the DEIS, Alternative 1 and Alternative 2. The Preferred Alternative for bus bays along the West Campus Access Road is sawtooth bus bays. The General Services Administration (GSA) does not have decision making authority over the Transportation Improvement Alternatives, but would continue to coordinate with District of Columbia Department of Transportation and the Federal Highway Administration, and other agencies to identify the preferred alternative for these improvements.

EPA understands the purpose and need for the proposed action for the DHS Consolidation at St. Elizabeths and commends GSA for its comprehensive analysis. However, as a result of our review of the DEIS, EPA has concerns with impacts to wetlands, soils, groundwater, surface water, aquatic biota and other resources. A detailed description of these concerns is presented in the Technical Comments (enclosed) for your consideration. EPA rated the DEIS an EC-2 (Environmental Concerns/Insufficient Information), which indicates that we have environmental concerns regarding the proposal and that there is insufficient information in the document to fully assess the environmental impacts of this project. A copy of the EPA's rating system is enclosed for your information.

Thank you for providing EPA with the opportunity to review this project. If you have questions regarding these comments, the staff contact for this project is Karen DelGrosso; she can be reached at 215-814-2765.

Sincerely,

Barbara Rudnick
NEPA Team Leader
Office of Environmental Programs

Enclosure (2)

Technical Comments

St. Elizabeths East Campus North Parcel and Transportation Improvement Alternatives

Groundwater/Soils

Page 4-80 states, "Groundwater levels have not been recorded on the East Campus; however, groundwater levels on the West Campus were recorded at depths of approximately 15 to 59 feet below ground surface (bgs)." The DEIS cites groundwater levels of nearby areas and makes associations based on similar soil types. Even though there is no major groundwater pumping centers in close proximity to the East Campus, the area does contain fly ash contamination. It should be stated if groundwater gradient and transport direction has been determined for the area, and if potential discharge locations or contaminant sources identified. Please explain why groundwater levels were not recorded on the East Campus.

Page 4-81 states, "It is assumed that groundwater conditions on the East Campus are similar to those on the West Campus. Groundwater samples taken on the St. Elizabeths West Campus had petroleum contamination, and lead and barium contaminant levels that exceed the District of Columbia Groundwater Quality Standards." In addition, "Some remedial actions were undertaken by GSA to combat petroleum contamination for onsite groundwater; however, sources of petroleum contamination have not been identified." It seems that the contamination found on the West Campus would necessitate groundwater sampling on the East Campus to ensure the integrity of groundwater quality and to determine remedial action, if necessary.

Page 4-81 continues, "Metals are naturally occurring substances. A Dioxin RI was completed for the St. Elizabeths West Campus in areas suspected to have been filled with ash or used for onsite disposal of ash and other materials." In addition, "Surface water, sediments, surface soil, subsurface soil, and groundwater samples were collected and analyzed for volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons (PAHs), metals, and dioxins and furan (D/F), which were all identified. A Risk Assessment has been completed for the St. Elizabeths West Campus to determine the potential risk posed to human health by the contaminants identified in each medium. Again, similar sampling on the East Campus is suggested to determine the presence of contamination and need for remedial action.

Page 4-172 states, "District of Columbia Department of the Environment (DDOE) Leaking Underground Storage Tank (LUST) case number 8808 was opened on April 27, 1988, LUSTs were discovered in the vicinity of the Motor Pool Building and the Dix Pavilion. The underground storage tanks (USTs) that were believed to be leaking were subsequently removed; however, there is the potential for additional USTs to exist within the vicinity of the Motor Pool Building." The FEIS should provide information indicating when and how many USTs were removed, specify if tank integrity was tested and whether soils were sampled, if remedial action was necessary; state the possible number of USTs that may still remain and location, whether there is a plan to identify the locations of remaining tanks, if tanks will be tested for integrity, and if there is a plan to investigate soil and groundwater contamination, if determined to be potentially present.

In addition, page 4-172 states that the following *de minimis* conditions were identified in the improper storage of materials which were observed in an around the Horse Barn. Improper storage included the placement of containers of oil, pesticides, and fertilizer directly on the

ground without the use of secondary containment. Although this Recognized Environmental Condition (REC) may appear to be *de minimis*, data supporting the *de minimis* status should be provided in the FEIS.

Each of the Site Development Alternatives would involve a new 750,000 gross square foot facility for FEMA and a 775-space employee parking structure on approximately 11.8 acres. Page 5-78 states that Alternative B (Campus Reflection), the Preferred Alternative, would result in additional soil erosion and sedimentation when compared to the other two alternatives (A and C) since a security fence and retaining wall would extend to the east along the parking garage. Construction of the fence and retaining wall would require removal of an estimated 6,000 square feet of a wooded ravine. The Comprehensive Plan for the National Capital lists two Federal Elements: 1) "Discourage development in areas of identified high erosion potential, on slopes with a gradient of 15 percent and above, and on severely eroded soils. Excessive slopes (25 percent and above) should remain undeveloped." 2) "Maintain and preserve woodlands and vegetated areas on steep slopes and adjacent to waterways, especially to aid in the control of erosion and sediment." Please describe the area of the wooded ravine identifying gradient of slopes and adherence to these policies.

The total acres of soil disturbance for the Transportation Improvement projects would be approximately 17.4 acres for Alternative 1 and 21.9 acres for Alternative 2. The DEIS states (page 5-90) that the area of land that would become impervious as a result of the Preferred Alternative would be negligible compared to the size of the entire subwatershed (4,786 acres), thus this alternative would only create a negligible indirect impact on groundwater hydrology and quality.

The DEIS states (page 5-96) that mitigation for the increase in impervious area would be achieved by the use of infiltration devices to capture storm water runoff and divert it to the subsurface. In addition, a large amount of pervious vegetated surface, specifically around the eastern and northern East Campus Study Area perimeters and within the Shepherd Parkway, would not be developed. This undeveloped pervious surface area would allow for groundwater recharge. However, all attempts should be made to avoid impacting these recharge areas, specifically the wooded ravine. Have other alternatives been explored with regards to the parking garage to avoid or minimize impact of the wooded ravine for the fence and retaining wall?

Assumptions/comparisons are discouraged when evaluating environmental conditions of groundwater and soils on the West Campus and the East Campus. The above descriptions warrant the need to test both groundwater and soils on the East Campus. It is important to note that development of land affects the quantity and quality of water resources (groundwater and surface water). In addition, nearly all surface-water features (streams, lakes, reservoirs, wetlands, and estuaries) interact with groundwater. Thus, the quality of these resources is of utmost importance regardless of the presence and use of drinking water supply wells.

Wetlands/Surface Water

As mentioned in the previous paragraph, the interaction of land development and the quantity and quality of water resources in all forms is an important environmental component.

The impact to wetlands and streams affected by the proposed action (East and West Campuses and the Transportation Improvement Alternatives) is to be considered cumulatively.

Page 4-86 states, "Two streams (i.e., WL11 and WL7) and two ephemeral channels (i.e., Ephemeral 4/Flood Plain, Ephemeral 5/ Erosion Ditch and) are within the I-295/Malcolm X Avenue and West Campus Access Road Transportation Improvement Study Area." "Based on the 2009 formal wetland and waters of the United States delineation, streams WL11 and WL7 meet the definition of waters of the United States and are subject to jurisdiction under Section 404 of the CWA and District of Columbia waterways and wetland regulations." Both of these two wetland areas are not listed in Table 4.3-2 (Wetlands on the East Campus, West Campus, and Shepherd Parkway) and should be added to the Table to allow for a comprehensive evaluation. The lower portion of WL11 has perennial stream characteristics. The section of the stream from the upstream outfall to the downstream culvert is approximately 932 linear feet. Another section of the stream is approximately 794 linear feet, totaling 1,726 linear feet of surface flow. Approximately 264 linear feet is piped underground. Wetlands WL7 is approximately 347 linear feet in length and is approximately 3 to 6 feet in width.

As noted on page 5-70 Wetland WL9 (1,649 square feet of palustrine forested) and Wetland WL10 (512 square feet of palustrine forested) would be directly impacted due to filling activities. Since these wetlands were determined to be jurisdictional and dredging or placement of fill within the wetland is proposed, GSA would be required to obtain a permit under Section 404 of the CWA for actions determined to adversely impact jurisdictional waters of the United States. Alternatives to avoid impacts to aquatic resources should be prepared; if demonstrated impacts are unavoidable, minimization of impacts and mitigation for lost functions and values should be proposed.

Page 4-88 states that there are seven areas on the East Campus Study Area, Wetlands A through G, that exhibit wetland characteristics which are located in the natural area. Potentially jurisdictional waters of the United States total 1,547 linear feet of stream channel and 0.38 acres of wetlands. Page 5-79 states, "No direct impacts are anticipated on any wetlands under Site Development Alternative B." Page 5-73 states, "No streams or surface water bodies would be diverted." However, when viewing Figure 4.3-6 (St. Elizabeths East Campus Wetland and Stream Areas), the North Parcel Area is depicted and within it is Wetland C, the Stickfoot Branch Tributary and two culverts. Without an overlay of the Preferred Alternative, it appears as if these areas would be directly impacted. Please provide a map that more accurately depicts the presence of these areas and the proposed site development to eliminate this discrepancy. It should be considered if impacts could affect hydrology or functions and values of the resources even if direct fill is not anticipated.

Page 4-89, Table 4.3-2 (Wetlands on the East Campus, West Campus, and Shepherd Parkway), show the wetland type and size in square feet of the wetlands impacted by the Proposed Action. Individually, the impact to wetlands may not appear significant; however, the cumulative impact to all wetlands and surface waters on the East and West Campuses and the Transportation Improvement areas is to be carefully considered. As stated in the Cumulative Impacts Analysis (page 5-222) "Wetlands could be created, restored, and enhanced to mitigate any adverse impacts of redevelopment." Of course, avoidance is always preferred and all options exhausted before resorting to wetland impact since wetland creation, restoration an

enhancement sometimes fail to meet it planned objective; thus follow up action and maintenance is required.

As discussed on page 4-89, Wetlands adjacent to non-relatively permanent waters also require a significant nexus evaluation. "In addition, further documentation on the perennial streams would need to be included to request a JD." The text goes on to say, "The preliminary boundaries of these areas have not been verified by USACE; therefore, they are not suitable for use in final planning or engineering design until all jurisdictional areas and boundaries have been approved by the USACE." The U.S. Army Corps of Engineers (USACE) involvement and approval is paramount in the advancement and planning of the proposed action.

Page 5-21 states, "Construction of the parking garage would necessitate the modification of the riparian slope and removal of slope vegetation east of the Horse Barn and would have a major, long-term, adverse, direct impact." The parking garage appears to be the same for all three site development alternatives. However, Alternative B, the Preferred Alternative, would require removal of 6,000 square feet of wooded ravine to allow for a security fence and retaining wall. This proposed segment of the project should outline the direct and indirect impacts to wetlands and the nearby stream. Again, to avoid changing the riparian slope, have alternative locations/designs for the parking garage been evaluated to avoid impact? Is the security fence/retaining wall a necessary component of the Proposed Action?

Page 7-9 states, "By not proposing any new buildings near the location of potential wetlands, direct impacts would be avoided, but indirect impacts would occur." Indirect impacts should be clearly stated. In addition, "Direct impacts on wetlands would be expected along the West Campus Access Road." There are various opportunities to create, restore, and enhance wetlands on the St. Elizabeths Campus to offset direct or indirect impacts. Although mitigation requirements are decided by the USACE and DDOE, early coordination may have afforded possible mitigation options and locations to be discussed and evaluated in the FEIS.

Alternative 1 of the Transportation Improvement alternatives states (page 5-85), "Depending on where the transportation improvements are aligned, the implementation of Alternative 1 could require the fill of Wetland WL8 in its entirely, resulting in long-term moderate, direct, adverse impacts on wetlands from the removal of 809 square feet of palustrine forested wetland." If the alignment avoids this wetland, indirect adverse impacts would still be anticipated. Please identify the indirect impacts. Again, avoidance is preferred and it is recommended that alignment avoid impacting this wetland.

Pages 5-97 and 7-9 acknowledge that appropriate compensation for wetland impacts is required. Analysis to determine the functions and values of the resources on site should be developed; the functions and values lost to the watershed, directly or indirectly by the project, should be replaced by compensatory mitigation. In general, a ratio of at least 1:1 (wetlands impacted/wetlands created) would be required and would be decided by the permitting agency on a case-by-case basis. Although the ratio could be higher based on the wetlands impacted. Also, wetland enhancement and restoration projects require a higher mitigation ratio than 1:1. Since the proposed action would result in impacts to forested wetlands, these high rated wetland systems are of significant importance. Therefore, impacts should be avoided to the maximum extent practicable.

Page 7-10 states, "Another overall mitigation measure for the site would be providing some additional sources of surface water as part of the storm water management plan for the Proposed Action." Please explain further and indicate possible locations for this mitigation measure.

The direct impact and indirect impact of all wetlands should be clearly presented. The Fish and Wildlife Service expressed in its letters of January 6, 2010 and August 17, 2010 its concern for wetland protection emphasizing that Federal and state partners of the Chesapeake Bay Program have adopted an interim goal of no overall net loss of the Basin's remaining wetlands and the long term goal of increasing the quality and quantity of the Basin's wetlands resource base. EPA endorses these goals and questions recent coordination with the USACE. The Distribution List provided in Section 10 does not identify distribution of the DEIS to the USACE (although the USACE was on the Interested Party Mailing List for Scoping). Thus, EPA questions why the USACE was not included in the distribution of the DEIS.

Aquatic Biota

Page 4-101, East Campus Study Area, states "The wetlands identified in Section 4.3.4 and on Figure 4.3-6 have the potential to sustain aquatic biota; however, results for riparian and aquatic habitat for the West Campus indicated that the habitat ranges from poor to suboptimal. The study found inadequate habitat for fish due to limited water depth." Based on this statement, it is assumed that the results of evaluating the West Campus are indicative of what is to be found on the East Campus. It is expected that data will be submitted to substantiate conditions. Since the streams on the North Parcel are in the natural area, the proximity to development could pose a potential indirect impact to the stream and aquatic biota. In addition, several streams and wetlands (i.e. Streams WL11 and WL1; Wetlands WL8) provide habitat to aquatic biota and are within the I-295/Malcolm X Avenue Interchange/West Campus Access Road transportation improvement study area. Thus, an analysis of both fish and benthic communities should be conducted to determine the quality and function of the aquatic biota. Mitigation measures should be outlined. The purpose of the survey is: 1) to detect impairment of aquatic biota, 2) to assess the relative severity of the impairment, 3) to prioritize sites for more intensive evaluation, and 4) to define baseline conditions and documenting recovery from impairment following mitigation actions.

Environmental Contamination

Page 4-116 states "From 1982 to 1989, approximately 20 acres of St. Elizabeths East Campus were used as a solid waste landfill. The landfill area included central and eastern portions of the North Parcel. Fly ash was disposed in the landfill and remains buried onsite." The Proposed Action on the North Parcel will consume approximately 11.8 acres. Considering the significance in size and contamination, the FEIS should include a map indicating the exact location of the landfill/fly ash contamination. Clarification is needed to show where construction activities will be located relative to the landfill.

Page 5-206, "Fly ash and fill material from the landfill area on the eastern portion of the North Parcel and petroleum contamination from historic LUSTs within the vicinity of the Garage/Motor Pool and Dix Pavilion that would be disturbed by construction activities would be

characterized and removed as appropriate from the Proposed Project Site and disposed of at an authorized landfill." Additionally, improperly stored hazardous materials including 55-gallon oil drums in the vicinity of the Garage/Motor Pool and containers of oil, pesticides, and fertilizer in the Horse Barn would be removed from the Proposed Project Site and disposed of at an authorized facility." Is follow-up soil testing a necessary component to ensure there is no residual contamination? It is unclear if a Sampling and Analysis Plan has been developed. It should be discussed if there is a work plan conceived that will be implemented to identify extent of contamination, sampling and potential clean-up and disposal methods, necessary health and safety requirements, areas that need to be avoided during construction, etc.

Page 4-173-174 states, "A small surface water feature was previously situated within the southeastern corner of the North Parcel, as evidenced in a 1988 aerial photograph contained in the Phase I Environmental Site Assessment of the North Parcel." The surface water feature was no longer visible in the 1998 aerial photograph contained in the assessment." According to the Phase I Environmental Site Assessment, this water feature possibly served as a storm water management pond to support landfill activities and runoff from the vicinity.

Additionally, "Pond sediments sampled in 1985 contained 340 ppb or PCB-1260. Fill material and water sampled in 1985 revealed elevated levels of heavy metals including lead, which was detected at concentrations up to 7,900 ppm. Based on the results of the sampling conducted in 1985, the U.S. Department of Health and Human Services (DHHS) concluded that surface soils levels of 2,3,7,8-TCDD and other polychlorinated D/F present in the area of the former landfill should not pose a public health threat to employees, patients, residents, or landfill workers. However, since polychlorinated D/F might exist at levels of concern at depths greater than one foot in the area of the former landfill, the DHHS recommended that core sampling be conducted prior to future construction in the fill area or prior to a land use change." Because of the recommendation by DHHS, it would be prudent to have the core sampling done before project approval/implementation. It is unclear if the conclusion of the DHHS is appropriate and protective for the current planned construction and land use.

Page 4-180 states, "Based on this information and a review of a stream tunnel map of the St. Elizabeths East Campus dated 1985, it is likely that asbestos insulation exists within the North Parcel steam tunnels in the vicinity of the Motor Pool Building and the Dix Pavilion." Will the steam tunnels be disturbed from site development?

Cultural Resources/Cultural Landscapes/Vegetation

Page 4-39, "Aside from the weedy vegetation throughout the Farm Unit, there is a large catalpa tree on the farm road that might be historic." It is assumed that the catalpa tree and the farm road may be historic. More discussion is needed to identify where the potential farm road is on the North Parcel as well as the location of the catalpa tree. Impacts as well as mitigation measures should be discussed in the FEIS.

Page 5-28, Alternative B (Preferred Alternative) "The FEMA buildings under this alternative would not be perceived as visually intrusive as under Alternative A. The FEMA buildings will be five, two, and one stories higher than the Horse Barn, Cottages, and Dry Barn. Although not as visually intrusive as Alternative A, it would seem that the buildings themselves

will have an impact on setting and feeling of nearby historic buildings and views. Discuss how the FEMA buildings can limit their impact by use of color/building material, etc.

Page 7-6 outlines possible measures to minimize impact in the Shepherd Parkway from construction of the West Campus Access Road which would alter road design features. What is the likelihood of implementing the proposed mitigation measures to minimize impacts to the Shepherd Parkway? If feasible, it seems logical to incorporate the proposed mitigation measures into the design (11-foot lanes as opposed to 12-foot lands; reduce the ramp radius to 144 feet as opposed to 150 feet; relocation off-ramp to DDOT ROW; reconstruction South Capitol Street on-ramp; minimize ramp shoulder area to 6 to 8 feet; reduce retaining wall heights; and lower profile of improvement to more closely match existing topography). Discuss the feasibility of incorporating these mitigation measures. How much of Shepherds Parkway would be spared with implementation of these mitigation measures? Please provide a comparison to measure the difference in impact between proposed alternatives and mitigation.

Page 5-51, "The segment of MLK Avenue that runs the length of the East and West campuses has been determined to contribute to the overall campus circulation system of the St. Elizabeths Hospital Historic District." In addition, "The widened roadway and the transportation improvements, such as signalization and addition striping, would adversely impact the roadway itself (ROW, roadway, and flanking public space), and views of the hospital along the street, the public's most common experience of the campus." Thus, the transportation improvements to MLK Avenue would result in long-term, direct, adverse impact on the historic boundaries of St. Elizabeths and on features of its circulation system, on historic trees, and would alter the visual and spatial relationships between the east and west portions of the hospital.

Although future Memorandum of Agreements (MOAs) would incorporate mitigation measures for impacted cultural resources, the cumulative effects from the East and West Campuses and the Transportation Improvement Alternatives would be great. EPA defers consideration and treatment of the Proposed Action impacts on cultural resources to the appropriate regulatory authorities to assess the cumulative impacts.

Vegetation/Wildlife

There is a grove of trees more than 60 years old which includes tulip poplar, sweetgum, American beech and northern red oak as identified on page 4-95; however, the Mitigation Section does not identify or propose mitigation measures for the 60+ year old grove of trees. Please address in the FEIS. Also, there is a large catalpa tree that may be historic and will be impacted by the Proposed Action. A description of this special tree including circumference size should be included in the FEIS.

In addition, the Urban Forest Preservation Act of 2002, effective June 12, 2003 (D.C. Law 14-309; D.C. Official Code 8-6501.01 et seq.), established an urban forest preservation program requiring a Special Tree Removal Permit prior to the removal of a tree with a circumference equal to or greater than 55 inches. If a tree removal permit is approved, the Urban Forestry Administration will require the replacement of lost trees based on caliper, either on the site or in a comparable area and/or the payment of a fee to the Urban Forestry Administration's

Tree Fund. Please discuss if the 60+ year old grove of trees and the catalpa tree falls within the framework of this requirement and if so discuss replacement alternatives.

In addition, page 4-100 states that approximately 20.9 acres of forested or wooded areas exist within the I-295/Malcolm X Avenue interchange Transportation Improvements Study Area, the western portion of the West Campus, and the Shepherd Parkway. Page 7-9 of the Mitigation Section states, "For vegetation impacts, mitigation measures include potential removal of nonnative vegetation species and landscaping of newly developed areas with native vegetation." These are good measures; however, do they properly compensate for the significant lose of trees?

Page 7-10 states, "Minimization methods to reduce impacts from transportation improvements on forest area in the Shepherd Parkway include minimizing the width of traffic lanes and ramps and locating certain roads and ramps entirely within the DDOT ROW." Another minimization measure for the Shepherd Parkway would be to reconstruct the existing South Capitol Street on-ramp to I-295 northbound to allow for a net minimization of impacts of parkland. EPA is aware that the preferred alternative for the transportation improvements has not been determined; however, if these minimization methods are feasible, then why are they not incorporated into the alternative(s) at this phase of the planning process? Also, provide a comparison of impact with and without minimization measures in the FEIS.

The text states that a Forest Management Plan should be developed and implemented for the site. EPA is in full agreement and views this as a necessary component to the project. In addition, the Plan should include quantitative commitments of replanting of native vegetative (i.e. 2:1 ratio or as appropriate).

Page 5-78 states that impacts from the North Parcel Site Development Alternative B would be similar to those described under Alternative A. As a result of site development, landscaped grasses and less than 10 specimen trees would be lost from construction of new buildings and one specimen tree would be lost as a result of the proposed parking garage and the removal of approximately 0.5 acres of forested areas. The text states that "some of the lost functions of the specimen trees would be mitigated through the green roofs planned on the new facilities." Again, although green roofs are an excellent mitigation measure, does it properly compensate for impact to trees?

Environmental Justice

Page 4-122 "The area around St. Elizabeths East Campus contains predominately minority populations...." Poverty levels within the community surrounding St. Elizabaeths East Campus is at a higher poverty rate, approximately 44 percent, compared to the overall District of Columbia poverty rate of 20 percent." As a result, the FEIS should focus greater concern on the potential for adverse and/or disproportionate impacts on the community. For example, there may be significant impacts related to increased traffic as a result of the proposed action. In addition, there needs to be consideration of fugitive dusts, noise, and vibration impacts. It is also suggested that outreach efforts include notices to local ethnic news outlets which tend to be more widely read by local residents.

Page 5-101, "The south side, where the proposed new West Campus Access Road would be constructed and intersect with Firth Sterling Avenue, Barry Road, and Stevens Road, would require the acquisition of a ROW from areas used as medium-density residential. In addition, the improvements to Stevens Road and Firth Sterling Avenue access road would require the acquisition of minor amounts of land to allow for widening and improvement in the vicinity of the newly constructed intersection." Please describe the area of acquisition? Will homes be acquired? If so, how many homes and households will be impacted? How will homeowners be compensated?

Page 5-101, "As a result of the new businesses moving to the Congress Heights area, an increase in demand and desirability of housing in the area would lead to higher property values and potentially new housing units. This increase in demand could result in a slight increase in population and subsequently potentially force existing residents out of the area due to an increased cost of living." Thus, gentrification could preclude current and future residents from being able to afford housing in the area, potentially resulting in long-term, minor, indirect, adverse impacts." Has this been presented to neighboring communities? How can they overcome this possibility? Are resources available to them?

Noise

Appendix H, Supporting Noise Documentation, identifies the times that noise measurements were recorded (i.e., roughly samples were taken between 12:06 PM to 1:00 PM and 3:30 PM to 4:30 PM) to determine existing noise levels. It seems as though a more accurate representation of noise due to road volume would be the morning and evening rush hours (approximately 7:30 AM to 9:00 AM and 4:30 PM to 6:00 PM). The analysis doesn't describe how the projected increase in traffic due to the proposed action is quantified and assessed in the noise analysis. The Traffic Noise Model Results found in Appendix H would be better understood if it was accompanied by a narrative, particularly for the 2016 Alternative 1 Table and the 2016 Alternative 2 Table.

Page 5-118 "Construction and operation associated with transportation improvement Alternative 1 would result in the road being approximately 125 feet from the nearest residential area in Census Tract 73.02 in Congress Heights and approximately 280 feet under area existing conditions. Noise levels might increase in the area as a result, but the levels would not result in disproportional impacts. Therefore, noise levels would increase but would not be a disproportional impact on minority or low-income populations." The DEIS did not explain or present data to support this statement. Existing versus projected volume and noise analysis should be provided.

Miscellaneous

Page 5-74 references Section 3.6.1 in the following sentence, but it should read Section 5.3 (page 1-63). "In addition, per the SWA Final Rule (see Section 3.6.1), construction activities associated with the Proposed Action would be required to meet the non-numeric effluent limitations and design, install, and maintain effective erosion-and-sedimentation controls."